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BAKERY, CONFECTIONERY, TOBACCO WORKERS' AND
GRAIN MILLERS INTERNATIONAL UNION, LOCAL UNION
NO. 232, AFL-CIO-CLC

UNITED STATES OF AMERICA
NATIONAL LABOR RELATIONS BOARD

BAKERY, CONFECTIONERY, TOBACCO
WORKERS' AND GRAIN MILLERS
INTERNATIONAL UNION, LOCAL UNION
NO. 232, AFL-CIO-CLC,

Charging Party,

and

SHAMROCK FOODS COMPANY,

Respondent.

No. 28-CA-150157

**RESPONSE TO NOTICE TO SHOW
CAUSE**

Charging Party agrees the matter should be remanded to the Administrative Law Judge. The Union is prepared to put on evidence that there is no business justification for the disputed rules and that the employer has construed them overbroadly and unlawfully.

Under the circumstances of this employer, the Board must evaluate the facts of each Rule.

Dated: October 22, 2018

WEINBERG, ROGER & ROSENFELD
A Professional Corporation

By: /s/ David A. Rosenfeld
DAVID A. ROSENFELD
ALAN CROWLEY

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CERTIFICATE OF SERVICE

I am a citizen of the United States and resident of the State of California. I am employed in the County of Alameda, State of California, in the office of a member of the bar of this Court, at whose direction the service was made. I am over the age of eighteen years and not a party to the within action.

On October 22, 2018, I served the following documents in the manner described below:

RESPONSE TO NOTICE TO SHOW CAUSE

- ☒ (BY ELECTRONIC SERVICE: By electronically mailing a true and correct copy through Weinberg, Roger & Rosenfeld's electronic mail system from kkempler@unioncounsel.net to the email addresses set forth below.

On the following parties in this action:

Executive Secretary
National Labor Relations Board
1015 Half Street SE
Washington, D.C. 20570-0001

Via E-Filing

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I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed on October 22, 2018, at Alameda, California.

/s/ Karen Kempler
Karen Kempler